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Attorneys for Defendant Google Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANIEL MATERA and SUSAN RASHKIS,
as individuals, and on behalf of other persons
similarly situated,

Plaintiffs,

v.

GOOGLE, INC.,

Defendant.

Case No. 5:15-cv-04062 LHK

**STIPULATION AND [PROPOSED] ORDER
STAYING PROCEEDINGS PENDING
APPROVAL OF CLASS ACTION
SETTLEMENT**

Honorable Lucy H. Koh

1 WHEREAS, Plaintiffs Daniel Matera and Susan Rashkis (“Plaintiffs”) and Defendant
2 Google Inc. have successfully mediated a resolution of the case, finalized a settlement agreement,
3 and all parties have fully executed a complete settlement agreement.

4 NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR UNDERSIGNED
5 COUNSEL hereby stipulate and respectfully request that:

6 All non-settlement proceedings in this action, including all deadlines set forth in the
7 Court’s May 25, 2016 Case Management Order (Docket No. 40) and specifically the November
8 21, 2016 and December 21, 2016 class certification expert report deadlines, shall be stayed until
9 further Order of the Court.

10 Plaintiffs will file a motion for preliminary settlement approval within 30 days of the
11 Court’s entry of the below Order.

12
13 **IT IS SO STIPULATED.**

14 Dated: November 28, 2016

Respectfully submitted,

15 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

16
17 By: /s/ Michael W. Sobol
18 Michael W. Sobol

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Attorneys for Plaintiff and the Proposed Class

Dated: November 28, 2016

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Attorneys for Defendant Google Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2016

LUCY H. KOH
United States District Judge

ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)

I, Michael W. Sobol, attest that concurrence in the filing of this **STIPULATION AND [PROPOSED] ORDER STAYING PROCEEDINGS PENDING APPROVAL OF CLASS ACTION SETTLEMENT** has been obtained from Whitty Somvichian. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 28th day of November, 2016, at San Francisco, California.

/s/ Michael W. Sobol
Michael W. Sobol